To the General Counsel's Office,

Frankie Hampton

Digitally signed by Frankie Hampton DN: c=US, o=U.S. Government, ou=FEC, cn=Frankie Hampton Date: 2015.04.24 14:29:35

April 24, 2015

My name is Richard Wilson and I was the acting treasurer for the Friends of Warren Christopher campaign during the period referenced in the complaint and upon receipt of the complaint. I am no longer the treasurer, but I am responding on behalf of the campaign to MUR 6916.

Warren Christopher ran for Maryland 4th District Congressional seat in 2014. This was Warren's first political campaign and it was unfortunately unsuccessful in the Primary Election held on June 24, 2014. Warren received 13% of the votes while Donna Edwards received 87% of the votes. The pre-primary reports show that Warren raised \$154,603.88 while Donna had raised \$397,846.19. Warren did not accept any funding from Political Action Committees and contributed \$52,479.90 himself.

The complaint states that the campaign created for-profit businesses that were:

- Providing candidates and federal party committees (or are receiving from data companies) data and list-related products and services at below-market rates, constituting excessive, source-prohibited, and unreported in-kind contributions by the corporations
- Engaging in an illegal coordination scheme where the common vendors (Catalist LLC and NGP Van, LLC) use their specific products and services to exchange their campaigns' and parties' data with soft money groups making independent expenditures
- 3. Operating impermissibly since at least one of the for-profit companies has been established, financed, maintained, and/or controlled the Democratic National Committee

It is difficult to provide evidence of not taking the action since the result of not taking any of the above listed actions results in no evidence that the action was taken. The Friends of Warren Christopher campaign did not create a for-profit business.

All of the contributors to the campaign were listed in the reports filed with the FEC. It will be clear from those reports that none of the contributions were excessive and there were no in-kind contributions that went unreported. All of the in-kind contributions are listed in the same filings.

These reports also include the amount paid to NGP VAN for access to their software to manage campaign contributions, disbursements, and loans. We neither requested data be provide to nor provided data to any soft money groups.

I am uncertain what other information we can provide that will help in this matter other than what is already publicly available in our FEC filings. Please contact me if any further correspondence is necessary. The campaign and I both believe that the complaint received does not apply to Friends of Warren Christopher Campaign Committee as we have not behaved in any manner that we believe violates the Federal Election Campaign Act of 1971.

Regards,

Richard Wilson, Treasurer

Friends of Warren Christopher